

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Bryan A Reo,

Plaintiff,

– vs –

Ludivine Joan Claudia  
Reynaud,

Defendant.

Case No.: 1:22-cv-00510

Judge: James Gwin

Defendant's Responses to Plaintiff's  
Ancillary Case Management Motions

Defendant Ludivine Joan Claudia Reynaud, by and through her undersigned, for her Responses to the Plaintiff's Motion for an In Person Status Conference (ECF No. 31) and his Motion to Modify the Scheduling Order (ECF No. 32) states as follows.

The Defendant agrees that a status conference would be useful, but sees no reason why it should be conducted in person, much less in person with all parties present. The Defendant lives in Uccle, Belgium, nearly 4,000 miles from the Court. Requiring her to travel such a great distance for a procedural conference would impose an unnecessary hardship. The Plaintiff has been content to depose her, and the Court content to allow her to participate in both the Initial Case Management Conference, and the Status Conference now set for middle October, via Zoom. There is no good reason to depart from these time-and-money-saving arrangements.<sup>1</sup>

Should the Court sets a status conference before October, the Defendant respectfully suggests it might be beneficial for the parties to submit proposed agenda items in advance.

---

<sup>1</sup> In addition, undersigned counsel is recovering from injuries that have required a brief hospitalization and will continue to suffer difficulty walking without pain for an indeterminate number of days ahead. Should the Court see fit, he would be grateful for the chance to appear at any Status Conference via video.

The Defendant does not believe it is necessary to extend the case management schedule, but would not oppose an extension of the dispositive motion cutoff date by one month.

This is based on time lost by counsel due to recent injuries, anticipated time that will be lost by both of Defendant's counsel to the care of a terminally ill relative in the weeks ahead, counsel's previously scheduled eye surgery, now set for two days in September but based on recent events likely to be postponed by a month or so, and the need to prepare for a trial now set in Cuyahoga Common Pleas for early December 2022.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

RAYMOND V. VASVARI, JR. (0055538)

vasvari@vasvarilaw.com

K. ANN ZIMMERMAN (0059486)

zimmerman@vasvarilaw.com

VASVARI | ZIMMERMAN

20600 Chagrin Boulevard

Suite 800 Tower East

Shaker Heights, Ohio 44122

Telephone | 216.458.5880

Telecopier | 216.302.7000

Attorneys for Defendant

Ludivine Joan Claudia Reynaud

— CERTIFICATE OF SERVICE —

The foregoing was filed today, September 8, 2022, via the Court's Electronic Filing System. Service will be made upon represented parties and copies may be obtained through operation of the CM | ECF System.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

RAYMOND V. VASVARI, JR. (0055538)

vasvari@vasvarilaw.com

K. ANN ZIMMERMAN (0059486)

zimmerman@vasvarilaw.com

VASVARI | ZIMMERMAN

20600 Chagrin Boulevard

Suite 800 Tower East

Shaker Heights, Ohio 44122

Telephone | 216.458.5880

Telecopier | 216.302.7000

Attorneys for Defendant

Ludivine Joan Claudia Reynaud

– Certificate of Compliance –

The undersigned certified that this document complies with the requirement of L. R. Civ. 7.1(f) in that, exclusive of appendices, each of the statement checked below is true;

- ☒ It relates to a non-dispositive motion and is less than fifteen (15) pages;
- ☐ It relates to a dispositive motion in a case designated as on the expedited track, and is not longer than ten (10) pages;
- ☐ It relates to a dispositive motion in a case designated as administrative or standard track, or in a case not yet given a differentiated case management track designation, and is not longer than twenty (20) pages;
- ☐ It relates to a dispositive motion in a case designated as on the complex track, and is not longer than thirty (30) pages;
- ☐ It relates to a dispositive motion in a case designated as on the mass tort track, and is not longer than forty (40) pages;
- ☐ It exceeds fifteen (15) pages in any event, and it thus contains a brief statement of the issue(s) to be decided, a brief statement of the argument(s) made, and tables of both contents and of the authorities cited therein.

Respectfully submitted

/s/ Raymond V. Vasvari, Jr.

**Raymond V. Vasvari, Jr.** (0055538)

vasvari@vasvarilaw.com

**VASVARI | ZIMMERMAN**

One of the attorneys for Defendant